

IN THE UNITED STATES OF AMERICA
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA §
§
v. § NO. 4:14CR189
§ Judge Crone
JOSE ORLANDO BURITICA-BEDOYA §

ELEMENTS OF THE OFFENSE

You are charged in Count Five of the First Superseding Indictment with a violation of 18 U.S.C. §§ 1956(a)(1)(A)(i), 1956(a)(1)(B)(i), 1956(a)(2)(A) and 1956(a)(2)(B)(i), Conspiracy to Commit Money Laundering. The essential elements which must be proved beyond a reasonable doubt in order to establish a violation of that section are:

1. That the defendant and at least one other person made an agreement to commit the crime of money laundering in violation of 18 U.S.C. § 1956(a), as charged in the First Superseding Indictment;
2. That the defendant knew the unlawful purpose of the agreement and joined in it willfully, that is, with the intent to further the unlawful purpose;
3. That one of the conspirators during the existence of the conspiracy knowingly committed at least one of the overt acts described in the First Superseding Indictment, in order to accomplish some object or purpose of the conspiracy;
4. That the defendant intended to promote the carrying on of the specified unlawful activity or to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of the unlawful activity;
5. That the defendant knowingly transported, transmitted, or transferred monetary instruments or funds from the United States to or through a place

outside the United States, or to the United States from or through a place outside the United States;

6. That the defendant knew that the monetary instrument or funds involved in the transportation, transmission or transfer represented the proceeds of the specified unlawful activity; and
7. That the defendant knew that such transportation, transmission or transfer was designed, in whole or in part, to conceal or disguise the nature, the source, the ownership, or the control of the proceeds of the specified unlawful activity.

Respectfully submitted,

JOHN M. BALES
United States Attorney

/s/
ERNEST GONZALEZ
Assistant United States Attorney
101 East Park Blvd., Suite 500
Plano, Texas 75074
Telephone: 972/509-1201
Facsimile: 972/509-1209
State Bar No. 00789318

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was filed via electronic filing to defense counsel on September 29, 2016.

/s/
Ernest Gonzalez